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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA NEVADA

ALFRED DARNELL GREENE and
CHRISTOPHER SUASAENG, individually, and
on behalf of all others similarly situated,

Plaintiffs,

vs.

OMNI LIMOUSINE, INC.,

Defendant.

CASE NO.: 2:18-CV-01760-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFFS' COMPLAINT**

[FIRST REQUEST]

The parties, by and through their counsel of record, hereby stipulate and agree as follows:

1. That Defendant's time to answer or otherwise respond to Plaintiffs' Complaint shall be extended up to and including **October 19, 2018**.

2. That the limitations period for the claims of putative collective action members shall be tolled, meaning Defendant will waive the statute of limitations affirmative defense, by fifteen (15) days from the date putative collective action members file their consent to join this lawsuit.

3. This tolling period does not revive any otherwise untimely claims of putative collective action members.

4. This tolling period is expressly conditioned upon the Court allowing the parties the extension requested herein. Should the Court deny the request, the tolling period shall be null and

void and of no effect.

This is the first request for an extension of this deadline. It is sought in good faith and not made for the purposes of delay but to allow counsel sufficient time to marshal the facts relevant to Plaintiff's collective-action allegations and to respond accordingly.

Dated this 5th day of October, 2018.

Dated this 5th day of October, 2018.

GARG GOLDEN LAW FIRM

WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN LLP

By /s/ Anthony B. Golden
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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATE: 10-15-2018